

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
DAVID SCOTT FLYNN : CASE NO. 5-16-02492

Debtor. :

NATIONSTAR MORTGAGE, LLC :
Movant, :

:

vs. :
DAVID SCOTT FLYNN :
Respondents. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, David Scott Flynn, the Debtor, and files an Answer to Nationstar
Mortgage, LLC's Motion for Relief From the Automatic Stay:

1. David Scott Flynn (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor fell behind on payments to the Movant. Debtor's Counsel is in possession of funds needed to be applied towards the arrears.
4. In the event there remains an arrears, the Debtor requests that the Movant enter into a Stipulation placing the post-petition arrears in an amended Plan and/or allowing the Debtor to cure the arrears over a six (6) month period.
5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: September 30, 2016

/s/Tullio DeLuca
Tullio DeLuca, Esquire
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 30, 2016, he caused a true and correct
copy of Debtor's Answer to Nationstar Mortgage LLC's for Relief from the Automatic Stay to be
served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the
following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Joshua Goldman, Esq. at jgoldman@kmllawgroup.com

Dated: September 30, 2016

/s/Tullio DeLuca
Tullio DeLuca, Esquire